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HEALTH ADVANCES, LLC

8 **UNITED STATES DISTRICT COURT**  
9  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 VIANKA DUVERGLAS, an individual,

12 Plaintiff,

13 v.

14 HEALTH ADVANCES, LLC, and DOES 1  
15 through 50, inclusive,

16 Defendants.

Case No. 3:20-cv-02849

**DECLARATION OF KRISTEN TURNER IN  
SUPPORT OF DEFENDANT HEALTH  
ADVANCES, LLC'S REMOVAL OF CIVIL  
ACTION**

Complaint Filed: March 18, 2020  
Trial Date:

**DECLARATION OF KRISTEN TURNER**

I, Kristen Turner, declare as follows:

1. I am the Chief Operating Officer ("COO") for Defendant Health Advances, LLC ("Defendant"). I have held this position since July 1, 2018.

2. I make this Declaration in support of the Notice of Removal of this action. Except in instances stated on information and belief, and in those instances I am informed and believe the statements declared, I have personal knowledge of the matters set forth in this declaration, and if called to testify, I would and could testify thereto. To the extent this declaration is based upon business records, those records are kept in the regular course of business, entries are made on those records in a timely manner by people with knowledge of the information being entered, and it is the regular practice of Defendant to maintain such records.

3. In my capacity as COO, I am familiar with Defendant's operations and I have personal knowledge regarding its corporate structure, including the location of company operations. I have access to information and data regarding Defendant's business operations in the regular course of my job duties.

4. Defendant is a limited liability company formed under the laws of Delaware. Defendant has its corporate and administrative offices and its principal place of business in Massachusetts, which is its center of direction, control and coordination.

5. The sole member of Defendant is Parexel International Corporation.

6. Parexel International Corporation is organized in the Commonwealth of Massachusetts, and has its corporate and administrative offices and its principal place of business in Massachusetts.


7. Neither Defendant nor its sole member, Parexel International Corporation, are California limited liability companies, California corporations, or headquartered in California.

8. Defendant and Parexel International Corporation perform the vast majority of their executive and administrative functions at their corporate headquarters in Massachusetts, where their high-level management personnel and officers are located, and from where they direct, control and coordinate activities including, without limitation: (1) matters relating to the financing of their

1 respective operations; (2) advertising and marketing of services; (3) directing general business  
2 strategy and operation; and (4) compliance with laws and legal services associated with such  
3 matters. The books and records relating to these and other matters are directed, controlled, and  
4 coordinated from the headquarters' offices in Massachusetts.

5 I declare under penalty of perjury pursuant to the laws of the United States and the State of  
6 California that the foregoing is true and correct.

7 Executed on April 17, 2020, at Newton, MA.

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Kristen Turner, COO

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